

Form M-100

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION**

In re: USA Logistics

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**Case No. 10-20102-RSS
(Chapter 11)**

MOTION FOR ENTRY OF AGREED ORDER CONDITIONING AUTOMATIC STAY [AND CO-DEBTOR STAY] REGARDING EXEMPT PROPERTY

THIS IS A MOTION FOR ENTRY OF AN AGREED ORDER CONDITIONING THE AUTOMATIC STAY. IF YOU OBJECT TO THE GRANTING OF RELIEF, YOU SHOULD CONTACT THE MOVANT IMMEDIATELY TO TRY TO REACH AN AGREEMENT. IF YOU CANNOT REACH AN AGREEMENT, YOU MUST FILE A WRITTEN RESPONSE AND SEND A COPY TO MOVANT WITHIN 15 DAYS OF THE DATE THIS WAS MAILED TO YOU. IF NO TIMELY OPPOSITION IS FILED, THE COURT MAY GRANT THE RELIEF WITHOUT A HEARING.

1. Movant: Ferrari Financial Services, Inc.
2. Movant, directly or as agent for the holder, holds a security interest in 2007 Ferrari 599 - VIN: ZFFFC60A270154833.
3. The Debtor's exemptions _____ have _____ have not been allowed.
4. Type of collateral (e.g., Home, Manufactured Home, Car, Truck, Motorcycle): Car.
5. Debtor's scheduled value of property: \$0.00.
6. Movant's estimated value of property: \$222,800.00
7. Total deficiency amount owed to movant: \$105,499.34.
8. Estimated equity (paragraph 6 minus paragraph 7): \$117,300.66.
9. Total pre and post-petition arrearages: \$105,499.34.
10. Total post-petition arrearages: \$105,499.34.
11. Amount of unpaid, past due property taxes, if applicable: \$ _____.
12. Expiration date on insurance policy, if applicable: _____.
13. Movant and Debtor [and co-debtor, if applicable] have agreed to condition the automatic stay pursuant to the terms of the attached agreed order. Accordingly, the parties request entry of the agreed order.

Date: June 1, 2010

/s/ J. Ward Holliday

Movant's counsel

Name: J. Ward Holliday

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Form M-100

Certificate of Service and Certificate of Compliance with BLR 4001

A copy of this motion was served on the persons shown on exhibit "1" at the addresses reflected on that exhibit on June 1, 2010 by prepaid United States first class mail, or by electronic filing notification. Movant certifies that movant has complied with Bankruptcy Local Rule 4001.

/s/ J. Ward Holliday

Movant's counsel